

PART B APPLICATION REVIEW CHECKLIST

NAME OF FACILITY: McDonnell Douglas - Tract IEPA I.D. NO. MO0000818963LOCATION: St. Louis, MoREVIEWED BY: Stephen P. Busch

GENERAL FACILITY STANDARDS

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND.	
				Ref. No.	Cond. No.
1. <u>GENERAL DESCRIPTION OF FACILITY 122.25(a)(1)</u> (Note: For new facilities, Part A of the permit application satisfies this requirement. For existing facilities, the Part A originally submitted (or the most recent revised Part A) satisfies this requirement, as long as the Part A remains complete and accurate.	Section A Part A Application Section B B-1 and B-2	Part A reviewed I.S. letter sent 3/29/82 General Description thoroughly presented			
2. <u>TOPOGRAPHIC MAP 122.25(a)(19)</u> A. One topographic map showing a distance of 1000 ft.* around the facility at a scale of 2.5 centimeters (1 inch) equal to not more than 61.0 meters (200 ft.). Contours must be shown on the map. (*NOTE: For large HWMP review on case- by-case basis use of other scales)	Section B B-3 Fig. B-1	Proper Scale Given	Maps declared Confidential		
B. The contour interval must be suffi- cient to clearly show the pattern of surface water flow in the vicinity of and from each operational unit of the facility (e.g., 5 ft. contour intervals if relief greater than 20 ft. or 2 ft. intervals if relief less than 20 ft.).	Fig B-1	Proper Contours Provided			
C. The map shall clearly show the following: (i) Map scale and date; ✓ (ii) 100 yr. floodplain area; ✓ (iii) Surface waters including intermittent streams; ✓ (iv) Surrounding land uses; ✓	Fig B-1 Thru B-8	Various maps used in combination provide the proper information Information declared as ↓			

R00148162
RCRA RECORDS CENTER

GENERAL FACILITIES STANDARDS

Page 2

Topo. Map




Location Info.

EPA I.D. NO.:



PERMIT
COND.Ref. Cond.
No. No.

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	
(v) Wind rose (prevailing windspeed and direction); (vi) North arrow; (vii) Legal boundaries of HWM site; (viii) Access control (fences, gates); (ix) Injection and withdrawal wells both on-site and off-site; (x) Buildings; treatment, storage or disposal operations or other structures; (xi) Barriers for drainage or flood control; (xii) Location of operational units within HWM site where hazardous waste will be treated, stored or disposed of.	not clearly defined not applicable not clearly defined	continued from previous page incomplete, submitted in Jan 17, 1983 letter. Information adequate to satisfy 122.25(a)(19) x and xii submitted in Jan 17, 1983 letter from J.C. Patterson		
3. <u>FACILITY LOCATION INFORMATION</u> <u>122.25(a)(11) & 264.18(a)(b)</u> <u>and Appendix VI (Part 264)</u>				
A. <u>Seismic Standard</u> - applicable only to new facilities. To determine applicability of seismic std. (264.18(a)) the owner/operator of a new facility must identify the political jurisdiction in which the facility is proposed to be located. (i) If the county or election district is not listed in Appendix VI, Part 264, no further information is required to demonstrate compliance with 264.18(a). <u>Not applicable to facilities in Region VII</u> (see 11/23/82 Federal Register). (ii) If the county or election district is listed in Appendix IV, Part 264 see 264.18(a) and 122.25(a)(11) for further information requirements.	page B-8	Not located in base area Applicable to new facilities only		

EPA I.D. NO.:

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. Cond. No. No.
<p><u>Floodplain Standard</u></p> <p>B. Owners/operators of all facilities shall provide an identification of whether facility is located within 100 year floodplain.</p> <p>(1) This identification must indicate the source of data for such determination and include a copy of Federal Insurance Administration (FIA) flood map or calculations and maps used if FIA map is not available. Information shall also be provided identifying 100 year flood level and other special flooding factors which must be considered in designing, constructing, operating or maintaining the facility to withstand washout from a 100 year flood.</p>	<p>page B-8 fig B-1</p> 	<p>Regulated facilities not within floodplain. Some storage tanks for recycling</p> <p>★ Source of 100-year flood data</p> <p>↓ See fig 1 - source U.S.G.S</p>		
<p>C. Owners and operators of facilities located in the 100 year floodplain must provide the following information:</p> <p>(i) Engineering analysis to indicate the various hydrodynamic and hydrostatic forces expected to result at the site as a consequence of a 100 year flood.</p> <p>(ii) Structural or other engineering studies showing the design of operational units (e.g., tanks, incinerators) and flood protection devices (e.g., floodwalls, dikes) at the facility and how these will prevent washout.</p> <p>(iii) If applicable, and in lieu of paragraphs (i) and (ii) above, a detailed description of procedures to be followed to remove hazardous waste to safety before the facility is flooded, including:</p>	<p>page B-8</p> 	<p>Not applicable</p> 		

EPA I.D. NO.:

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. Cond. No. No.
<p>(a) timing of such movement relative to flood levels, including estimated time to move the waste, to show that such movement can be completed before floodwaters reach the facility,</p> <p>(b) a description of the location(s) to which the waste will be moved and demonstration that those facilities will be eligible to receive hazardous waste in accordance with the regulations under Parts 122 through 124 and 264 through 266 of this chapter,</p> <p>(c) the planned procedures, equipment, and personnel to be used and the means to ensure that such resources will be available in time for use.</p> <p>(d) the potential for accidental discharges of the waste during movement.</p> <p>D. <u>Existing facilities</u> NOT in compliance with Sec. 264.18(b) shall provide a plan showing how the facility will be brought into compliance and a schedule for compliance.</p>	<p>page B-8</p> 	<p>Not Applicable</p> 		
<p>4. <u>TRAFFIC PATTERNS 122.25(a)(10)</u></p> <p>A. Describe:</p> <p>(i) Traffic pattern, ✓</p> <p>(ii) Estimated volume (numbers and types of vehicles), ✓</p> <p>(iii) Traffic control (turns across traffic lanes, stacking lanes), ✓</p> <p>(iv) Access road surfacing, ✓</p> <p>(v) Load bearing capacity, ✓</p> <p>(vi) Traffic control signals. ✓</p>	<p>Fig. B-7 page B-9</p> <p>need to address ★</p>	<p>Information needed, submitted 1/17/83</p>		

EPA I.D. NO.:

PERMIT COND.	
Ref. No.	Cond. No.

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS
<p><u>5. CHEMICAL AND PHYSICAL ANALYSES</u> <u>264.13(a) & 122.25(a)(2)</u></p> <p>1. At a minimum these analyses shall contain all the information which must be known to treat, store, or dispose of the wastes properly in accordance with Part 264.</p> <p>The analyses may:</p> <p>(i) be conducted on a representative sample of each hazardous waste;</p> <p>(ii) include waste characterization data developed under Part 261;</p> <p>(iii) include existing published or documented data on the hazardous waste or on hazardous waste generated from similar processes (e.g., the facility's records of past analyses performed on the waste); and</p> <p>(iv) be based on information supplied by the generator of the wastes.</p> <p>(NOTE: Part A of the application should be reviewed, to ensure that the facility has submitted analyses of all hazardous wastes which it handles.)</p>	<p>Section C</p> <p>pages C-1 thru C-6</p> <p>no actual analysis, however 261 characterization given.</p>	<p>Sec C p C-1 thru C-6</p> <p>Sufficient info. to determine nec. storage procedure</p> <p>Do we need to request actual analyses of waste streams?</p> <p>Test Methods PC-9 → spec. SW 846</p>	<p>Test methods should be from SW 846. This method refers to EPA-600/4-79/020 many times however first step should be to refer to SW 846</p>
<p><u>6. WASTE ANALYSIS PLAN 264.13(b), (c) & 122.25(a)(3)</u></p> <p>1. The waste analysis plan describes the procedures which the facility will carry out to conduct required waste analyses. At a minimum, the plan must specify:</p> <p>(i) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters;</p> <p>(ii) The test methods which will be used to test for these parameters;</p>	<p>Section C</p> <p>pages C-6 thru C-72</p> <p>Table C-1</p> <p>Table C-2</p>	<p>Section C</p> <p>p C-6 to C-10</p> <p>Table C-1</p> <p>Table C-2</p>	

EPA I.D. NO.:

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. Cond. No. No.
<p>(iii) The sampling method which will be used to obtain a representative sample of the waste to be analyzed. A representative sample may be obtained using either:</p> <p>(a) One of sampling methods described in Appendix of Part 261 of this Chapter; or</p> <p>(b) An equivalent sampling method. [Comment: See Sec. 260.21 for related discussion.]</p> <p>(iv) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up to date.</p> <p>v. Where applicable, methods used to meet additional waste analysis requirements as specified in 264.17 and 264.341.</p>	Table C-3	Table C-3		
<p>B. For <u>off-site facilities</u>, the plan must also specify:</p> <p>(i) the waste analyses that hazardous waste generators have agreed to supply; and</p> <p>(ii) the procedures which will be used to inspect and if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identity of the waste designated on the accompanying manifest or shipping paper. At a minimum, the plan must describe:</p> <p>(a) the procedures which will be used to determine the identity of each movement of waste managed at the facility; and</p> <p>(b) the sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling.</p>	page C-10	p C-10		

GENERAL FACILITY STANDARDS

EPA I.D. NO.:

Page 7
SecurityPERMIT
COND.
Ref. Cond.
No. No.

ITEM

COMPLETENESS
REVIEWTECHNICAL
REVIEW

COMMENTS

6. SECURITY PROCEDURES 264.14 &
122.25(a)(4)

Section F

Section F

A description of the security procedures and equipment required by Sec. 264.14, or a justification demonstrating the reasons for requesting a waiver of this requirement.

If a waiver is not requested, the facility must have:

(1) A 24-hour surveillance system (e.g., television monitoring or surveillance by guards or facility personnel) which continuously monitors and controls entry onto the active portion of the facility; or

yes F-2

of p F-2

(2)(i) An artificial or natural barrier (e.g., a fence in good repair or a fence combined with a cliff), which completely surrounds the active portion of the facility; and

yes F1

all areas fenced
p F-1, confirmed
during Doc
inspection
p F-3

(ii) A means to control entry, at all times, through the gates or other entrances to the active portion of the facility (e.g., an attendant, television monitors, locked entrance, or controlled roadway access to the facility).

yes F-3

p F-1 and F-3

These requirements are satisfied if the active portion of the facility is located within a facility or plant which has a surveillance system, or a barrier and a means to control entry, which complies with the above requirements.



GENERAL FACILITY STANDARDS

Page 8
Security

EPA I.D. NO.:

PERMIT
COND.
Ref. Cond.
No. No.

ITEM

COMPLETENESS
REVIEWTECHNICAL
REVIEW

COMMENTS

If a waiver is not granted, the facility must also have a sign with the legend, "Danger-Unauthorized Personnel Keep Out" which must be posted at each entrance to the active portion of the facility, and at other locations, in sufficient numbers to be seen from any approach to this active portion. The legend must be written in English and in any other language predominant in the area surrounding the facility and must be legible from a distance of at least 25 feet. Existing signs with a legend other than "Danger-Unauthorized Personnel Keep Out" may be used if the legend on the sign indicates that only authorized personnel are allowed to enter the active portion, and that entry onto the active portion can be dangerous.

If a waiver of these requirements is requested, the owner or operator must demonstrate that:

(1) Physical contact with the waste, structures, or equipment within the active portion of the facility will not injure unknowing or unauthorized persons or livestock which may enter the active portion of a facility; and

(2) Disturbance of the waste or equipment, by the unknowing or unauthorized entry of persons or livestock onto the active portion of a facility, will not cause a violation of the requirements of this Part.

yes F-3

not applicable


p F-3 para F-1a(3)

Not Applicable

GENERAL FACILITY STANDARDS

EPA I.D. NO.:

Page 9
Inspection Req.

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. Cond. No. No.
<p>7. GENERAL INSPECTION REQUIREMENTS 264.15 & 122.25(a)(5)</p> <p>A. A copy of the <u>general inspection schedule</u> required by Sec. 264.15(b); (Note: include, where applicable, as part of inspection schedule, specific requirements in Sections 264.174, 264.194, 264.226, and 264.254. See attached checklists).</p> <p>The schedule must include inspections of monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting or responding to environmental or human health hazards.</p> <p>(i) The schedule must identify the types of problems which are to be looked for during the inspection (such as malfunctions, deteriorations, operator errors, or discharges as inoperative sump pumps, leaking fitting, eroding, dikes, etc.).</p> <p>(ii) The frequency of inspection may vary for the items on the schedule. However, it should be based on the rate of possible deterioration of the equipment and the probability of an environmental or human health incident if the deterioration or malfunction or any operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas, must be inspected daily when in use.</p>	<p>page F-3 Sec F-2 addressed <u>very</u> briefly</p> <p>Fig F-1 page F-4</p>	<p>Section F-2</p>  <p>tank inspection poly tanks and clarifier can be inspected internally. These are only R.E.R.T tanks</p> <p>p F-4 para F-2a(2) Fig 1 p F-5</p>	<p>* will they be inspected internally on an annual basis, very brief discussion</p>	

EPA I.D. NO.:

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. Cond. No. No.
B. The owner/operator must remedy any deterioration or malfunction of equipment or structures, which the inspection reveals, on a schedule which ensures that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action must be taken immediately.	page F-6	p F-6 para F-2c		
C. The owner/operator must record inspections in an inspection log or summary. At a minimum, the record must include date and time of inspection, name of inspector, note of observations made and date and nature of repairs or remedial action. These records must be kept for three years from the date of inspection.	page F-5	p F-5, p F-6		
<p>8. <u>WAIVER OF PREPAREDNESS AND PREVENTION REQUIREMENTS</u> <u>PART 264, SUBPART C</u></p> <p>A. justification of any request for a waiver(s) of the preparedness and prevention requirements of Part 264, Subpart C.</p> <p>(i) Requests for a waiver from any of the <u>equipment requirements</u> must be accompanied by a demonstration that none of the hazards posed by waste handled at the facility could require the particular kind of equipment.</p> <p>(ii) Requests for a waiver of the <u>aisle space requirement</u> must be accompanied by a demonstration that aisle space is not needed to allow the</p>	<p>No Waiver Requested page F-6</p>	<p>No Waivers p F-6 Requested</p> <p>see See F-1 and G</p> <p>Aisle space addressed Sec F-5c</p>		

GENERAL FACILITY STANDARDS

Page 11

EPA I.D. NO.:

Preparedness/Prevention

PERMIT	
COND.	
Ref. No.	Cond. No.

ITEM

COMPLETENESS
REVIEWTECHNICAL
REVIEW

COMMENTS

unobstructed movement of personnel, fire protection equipment, spill control equipment, or decontamination equipment to any area of facility operation in an emergency.

B. Part 264, Subpart C requires the following preparedness and prevention measures: Required equipment 264.32:

(i) internal communication or alarm system capable of providing immediate emergency instruction (voice or signal).

(ii) Device, such as a telephone immediately available at the scene, or a hand-held two-way radio capable of summoning emergency assistance.

(iii) Portable fire extinguishers, fire control equipment (e.g., equipment using foam, inert gas or dry chemicals), spill control equipment and decontamination equipment.

(iv) Water at adequate volume and pressure to supply water hoses, automatic sprinklers or water spray systems.

C. Testing and maintenance of equipment 264.33 - All required equipment must be tested and maintained as necessary to assure its proper operation in time of emergency.

D. Access to communications or alarm system 264.34 - Whenever hazardous waste is being handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through voice or

p. F-7, Sec F-1
Sec G-1

internal phone
system

p F-1, G-23

have own fire
dept. p G-3

p G-3

* need more info




* need more info

EPA I.D. NO.:





Preparedness/Prevention

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. Cond. No. No.
visual contact with another employee. (ii) If there is ever just one employee on-site while the facility is operating, he must have immediate access to a device such as a telephone or hand-held two-way radio.		* access to alarm at storage areas		
E. Required aisle space 264.35 (i) Owner/operator must maintain aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control and decontamination equipment to any area of facility operation in an emergency.	page F-11	p F-11 sec F-5c		
F. Arrangements with local authorities 264.37 Owner/operator must attempt to make the following arrangements, as appropriate: (i) Arrangements to familiarize police, fire departments and emergency personnel with layout of facility, properties and hazards of hazardous waste handled, places where personnel will be working roads and evacuation routes. (ii) Where more than one police or fire department might respond, agreements designating primary authority and support to primary authority should be developed. (iii) Agreements with state emergency response teams, emergency response contractors and equipment suppliers (iv) Arrangements to familiarize hospitals with properties of hazardous waste handled and types of injuries or illnesses which could result from fires, explosions or releases.		p G-5 have own guards fire depart. etc have 911 phone own police and fire depart. will have primary authority * hospitals mentioned no discussion on familiarization		

EPA I.D. NO.:

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. Cond. No. No.
(v) Where state or local authorities refuse to enter into such arrangements, the owner/operator must document the refusal in the operating record.		* Not discussed		
9. <u>PREVENTIVE PROCEDURES</u> <u>(PROCEDURES, STRUCTURES OR</u> <u>EQUIPMENT) 122.25(a)(8)</u>		Good Sec F-4 See page no.		
A. A description of procedures, structures, or equipment used at the facility to: (i) Prevent hazards in unloading operations (for example, ramps, special forklifts); (ii) Prevent runoff from hazardous waste handling areas to other areas of the facility or environment, or to prevent flooding (for example, berms, dikes, trenches); (iii) Prevent contamination of water supplies; (Note: Check the map submitted with the Part B for evidence of nearby water supplies.) (iv) Mitigate effects of equipment failure and power outages; (v) Prevent undue exposure of personnel to hazardous waste (for example, protective clothing).	pages F-7 and F-8 page F-8 pages F-9 and F-9 page F-9 pages F-9 and F-10			
10. <u>GENERAL REQUIREMENTS FOR</u> <u>IGNITABLE, REACTIVE OR INCOMPATIBLE</u> <u>WASTES 264.17, 264.36 & 122.25(a)(9)</u>	Sec. F-5	Sec F-5 p. F-10		
A description of precautions to prevent accidental <u>ignition or reaction</u> of ignitable, reactive, or incompatible wastes as required to demonstrate compliance with Sec. 264.17 including				



EPA I.D. NO.:

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. Cond. No. No.
<p>documentation demonstrating compliance with Section 264.17(c).</p> <p>A. Check Part A and waste analysis submitted with Part B to determine if facility handles ignitable, reactive, or incompatible wastes.</p> <p>B. Facilities handling ignitable, reactive or incompatible wastes must demonstrate compliance with the appropriate requirements listed below. This documentation may be based on references to published scientific or engineering literature, data from trial tests (e.g., bench scale or pilot scale tests), waste analyses (as specified in Sec. 264.13), or the results of the treatment of similar wastes by similar treatment processes and under similar operating conditions</p> <p>C. All facilities handling <u>ignitable or reactive</u> waste must meet these requirements:</p> <p>(i) This waste must be separated and protected from sources of ignition or reaction including but not limited to: open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat.</p> <p>(ii) While ignitable or reactive waste is being handled, the owner or operator must confine smoking and open flame to specially designated locations;</p>	<p>Handle ignitable, reactive and incomp. wastes</p> <p>Sec F-5</p> 	<p>↓</p> <p>ok</p> <p>Sec F-5</p>  <p>p F-10, waste segregated</p> <p>ok</p>  <p>p- F-10 No Smoking</p> 		



EPA I.D. NO.:

Ignit./React. Wastes

PERMIT COND.	
Ref. No.	Cond. No.

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS
<p>(iii) "No Smoking" signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.</p> <p>D. Owners/operators of facilities handling ignitable, reactive or incompatible waste must meet the following requirements whenever 264.1(b) is referenced in the regulations for the appropriate type of facility:</p> <p>Where specifically required by other Sections of Part 264, the owner or operator of a facility that treats, stores or disposes ignitable or reactive waste, or mixes incompatible waste or incompatible wastes and other materials, must take precautions to prevent reactions which:</p> <p>(i) Generate extreme heat or pressure, fire or explosions, or violent reactions;</p> <p>(ii) Produce uncontrolled flammable fumes, dusts, or gases in sufficient quantities to threaten human health or the environment;</p> <p>(iii) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;</p> <p>(iv) Damage the structural integrity of the device or facility;</p> <p>(v) Through other like means threaten human health or the environment.</p>	<p>Sec F-5</p> 	<p>p F-10 ↓</p> <p>Sec F-5</p> <p>No mixing of incompatible wastes</p> <p>p F-11</p> <p>segregation of waste types covered, curbed container storage</p> <p>tank storage separate</p> <p>ol</p> 	

EPA I.D. NO.:




ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. Cond. No. No.
<p><u>11. CONTINGENCY PLAN AND EMERGENCY PROCEDURES, PART 264, SUBPART D & 122.25(a)(7)</u></p> <p>A copy of the contingency plan as required by Part 264, Subpart D.</p> <p>A. The contingency plan must: describe the actions facility personnel must take to comply with Sections 264.51 and 264.56 in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.</p> <p>(Note: If the owner or operator has already prepared a Spill Prevention, Control, and Counter-measures (SPCC) Plan in accordance with Part 172 or Part 151 of this Chapter, or some other emergency or contingency plan, he need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)</p> <p>B. Describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to Section 264.37.</p>	<p>Sec G</p>  <p>P. G-5</p>	<p>Sec G</p> <p>p G-8 p G-11 thru 17 p G-47 p G-30 spec</p>  <p>p G-5 p G-21</p>		

GENERAL FACILITY STANDARDS





EPA I.D. NO.:

Page 17
Contingency Plan

PERMIT COND.	
Ref. No.	Cond. No.

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS
<p>C. (i) List names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see Sec. 264.55), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in order in which they will assume responsibility as alternates.</p> <p>(ii) For <u>new facilities</u>, the information regarding emergency coordinator(s) must be supplied to the Regional Administrator at the time of certification, rather than at the time of permit application.</p>	<p>Emergency phone no G-2 and G-3</p>	<p>Emeg phom G-2 thru G-4 G-61 G-60</p> 	
<p>D. Include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location of each item on the list, and a brief outline of its capabilities. (264.52)</p>	<p>page G-3</p>	<p>p G-3</p> 	
<p>E. The plan must also include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fire). (264.52)</p>	<p>*no evacuation plan</p>	<p>G-21 G-23 thru 28</p> 	

EPA I.D. NO.:

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. Cond. No. No.
<p><u>EMERGENCY COORDINATOR (264.55)</u></p> <p>A. At all times, there must be at least one employee either on the facility premises or on call with the responsibility for coordinating all emergency response measures. This emergency coordinator must be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, location and characteristics of waste handled, location of all records within the facility and facility layout. This person must have the authority to commit the resources needed to carry out the contingency plan.</p> <p>B. See 264.56 Emergency Procedures for detailed duties of the emergency coordinator.</p> <p><u>Coordination Agreements for Primary Authority (See 264.37)</u></p>	<p>Sec G</p> 	<p>p G-3 and G-4</p> 		
<p><u>11. PERSONNEL TRAINING 264.16 & 122.25(a)(12)</u></p> <p>An outline of both the introductory and continuing <u>training programs</u> by owners or operators to prepare persons to operate or maintain the HWM facility in a safe manner as required to demonstrate compliance with Sec. 264.16. A brief description of how training will be designed to meet actual job tasks in accordance with requirements in Section 264.16(a)(3).</p>	<p>Sec H</p> 	<p>Sec H</p> 		

GENERAL FACILITY STANDARDS

EPA I.D. NO.:

Page 19
Personnel TrainingPERMIT
COND.
Ref. Cond.
No. No.

ITEM

COMPLETENESS
REVIEWTECHNICAL
REVIEW

COMMENTS

(Note: on-the-job training may be used to comply with these requirements.)

- A. The outline should briefly: (i) indicate the job title and duties of each employee;
- (ii) Describe the content, schedule, and techniques used in training each employee;
- (i) Describe both introductory and continuing training (including an annual review of the initial training;
- (iv) Show that the program is directed by a person trained in hazardous waste management;
- (v) Show that the program includes instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed;
- (vi) Show that the program is designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including where applicable:
- (a) Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
- (b) Key parameters for automatic waste feed cut-off systems;
- (c) Communications or alarm systems;
- (d) Response to fires or explosions;
- (e) Response to ground-water contamination incidents; and
- (f) Shutdown of operations.

pages H-1 and H-2

pages H-3 thru H-7
p. H-9

Sec H-1

not indicated

H-3

page H-8

Not Clear

ok
↓

Section H

p H-1 and ~~H-2~~
Fig H-1 → H-2Fig H-2 p H-3
p H-4 thru

Sec H-1

p H-6

Fig H-3 p H-7

* p H-8, brief
p H-6





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GENERAL FACILITY STANDARDS

Page 20



EPA I.D. NO.:

Personnel Training

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. Cond. No. No.
<p>B. For <u>existing facilities</u>, the outline should indicate that training has been given to and <u>successfully completed</u> by facility personnel within six months after the effective date of these regulations or six months after the date of their employment or assignment to a facility, or to a new position at a facility, whichever is later. Employees hired after the effective date of these regulations must not work in unsupervised positions until they have completed the training requirements.</p>	<p>ok Sec H-2</p> 	<p>Sec H-2 p H-9</p> 		
<p>C. <u>REQUIRED RECORDS 264.16(d) & (e)</u></p> <p>A. The permittee must maintain the following documents and records at the facility:</p> <p>(i) Job title for each position at facility related to hazardous waste management, and name of employee filling each job.</p> <p>(ii) Written job description for each position related to hazardous waste management.</p> <p>(iii) Written description of type and amount of both introductory and continuing training that will be given to each person filling a position related to hazardous waste management.</p> <p>(iv) Records documenting that the training or job experience required above has been given to and completed by facility personnel.</p> <p>B. Training records on current personnel must be kept until closure of the facility; training records on former employees must be kept for at least</p>	<p>Sec H-2</p> 	<p>Sec H-2 p H-9</p> 		

EPA I.D. NO.:

Post-Closure

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. Cond. No. No.
three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.		↓		
12. CLOSURE/POST-CLOSURE PLANS PART 264, SUBPART G & 122.25(a)(13)	Sec I	Sec I		
<u>Closure Plan</u> - All facilities: The plan must identify steps necessary to completely or partially close the facility at any point during its intended operating life and to completely close the facility at the end of its intended operating life. The plan should also describe all HWM activities at the site.				
A. The closure plan must include at least:				
(i) A description of how and when the facility will be partially closed, if applicable, and finally closed. The description must identify the maximum extent of the operation which will be unclosed during the life of the facility, and how the requirements of Sections 264.111, 264.113, 264.114, 265.115, and the applicable closure requirements of Sections 264.178, 264.197, 264.228 and 264.258 will be met;		p I-1		
(ii) An estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility;	page I-3	p I-3		
(iii) A description of the steps needed to decontaminate facility equipment during closure; and	Sec I-1d	Sec I-1d p I-3 thru 5		







GENERAL FACILITY STANDARDS

Page 22

Closure

Post-Closure



EPA I.D. NO:

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. Cond. No. No.
<p>(iv) An estimate of the expected year of closure and a schedule for final closure. The schedule must include, at a minimum, the total time required to close the facility and the time required for intervening closure activities which will allow tracking of the progress of closure. (For example, in the case of a landfill, estimates of the time required to treat and dispose of all waste inventory and of the time required to place a final cover must be included.)</p>	<p>Sec I Sec I-1e</p> 	<p>Sec. I I-1e p I-5</p> 		
<p><u>B. Disposal or Decontamination of Equipment (264.114)</u></p> <p>When closure is completed, all facility equipment and structures must have been properly disposed of, or decontaminated by removing all hazardous waste and residues. The plan should address disposal or decontamination of soils, as appropriate.</p>	<p>OR</p> 	<p>p I-3</p> 		
<p><u>C. CERTIFICATION OF CLOSURE (264.115)</u></p> <p>When closure is completed, the permittee must submit to EPA certification both by an independent registered professional engineer and the permittee that the facility has been closed in accordance with the approved closure plan.</p>	<p>page I-1</p> 	<p>p I-1 and 5 need to indicate independent</p> 		
<p><u>D. POST-CLOSURE PLAN (264.118)</u></p> <p>A disposal facility must have a written post-closure plan. The plan must identify the activities which will be carried on after closure and the</p>	<p>Not Applicable</p>	<p>Not Applicable</p>		




GENERAL FACILITY STANDARDS

Page 23
Post-Closure

EPA I.D. NO.:




ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. Cond. No. No.
<p>frequency of these activities and include at least:</p> <p>(i) Description of planned groundwater monitoring activities and frequencies at which they will be performed;</p> <p>(ii) Description of planned maintenance activities, and frequencies at which they will be performed to ensure:</p> <p>(a) the integrity of the cap and final cover or other containment structures where applicable;</p> <p>(b) function of the facility monitoring equipment;</p> <p>(c) name, address and phone number of person or office to contact about facility during the post-closure period. This person or office must keep an updated post-closure plan during the post-closure period.</p>	<p>not applicable</p> 	<p>not applicable</p> 		
<p><u>13. NOTICE TO LOCAL LAND AUTHORITY</u> <u>264.119</u></p> <p>Within 90 days after closure is completed, the owner or operator of a disposal facility must submit to the local zoning authority or the authority with jurisdiction over local land use and to the Regional Administrator a survey plat indicating the location and dimensions of landfill cells or other disposal areas with respect to permanently surveyed benchmarks. This plat must be prepared and certified by a professional land surveyor.</p>				

EPA I.D. NO.:

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. No. Cond. No.
<p>14. <u>NOTICE IN DEED TO PROPERTY</u> <u>264.120 & 122.25(a)(14)</u></p> <p>A. The owner of the property on which a disposal facility is located must record, in accordance with State law, a notation on the deed to the facility property--or on some other instrument which is normally examined during title search--that will in perpetuity notify any potential purchaser of the property that:</p> <p>(i) The land has been used to manage hazardous wastes;</p> <p>(ii) Its use is restricted under §264.117(c); and</p> <p>(iii) The survey plat and record of the type, location, and quantity of hazardous wastes disposed of within each cell or area of the facility required in §265.119 have been filed with the local zoning authority or the authority with jurisdiction over local land use and with the Regional Administrator of the Environmental Protection Agency .</p>	<p><i>Not Applicable</i></p> 	<p><i>not applicable</i></p> 		
<p>15. <u>COST ESTIMATES AND FINANCIAL ASSURANCE DOCUMENTS FOR ALL TSDs</u></p> <p>A. <u>Closure</u>-Owner/Operator must have a written estimate of the cost of closing the facility. [Sections 122.25(a)(15), 264.142(a), 264.143, 264-112-115)]</p> <p>The estimate must equal the cost of closure at the point in the facility's operating life when the extent and manner of its closure is the most expensive. [Section 264.112(a)]</p>	<p><i>Sec I, Table I-1 Annual Report Attachment B-1 See note from Midge G. Review by Midge G.</i></p> 	<p><i>Sec. I, Table IV Annual Report Attachment B-1 Reviewed by Michelle Perry-Williams</i></p>		

EPA I.D. NO.:

PERMIT COND.	
Ref. No.	Cond. No.

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS
<p>B. Facilities may choose among these options in establishing financial assurance. (See attachment 1 RCRA Subpart H Fin. Req. Checklist</p> <p>(i) Closure Trust Fund [264.143(a)]</p> <p>(ii) Surety Bond guaranteeing payment into a closure trust fund [264.143(b)]</p> <p>(iii) Surety Bond guaranteeing performance of closure [264.143(c)]</p> <p>(iv) Closure Letter of Credit (Standby Trust Fund) [264.143(d)]</p> <p>(v) Insurance Policy for Closure [264.143(e)]</p> <p>(vi) Financial Test/Corporate Guarantee for Closure [264.143(f)]</p> <p>(vii) Multiple Mechanisms [264.143(g)]</p> <p>(viii) State Required Mechanism determined equivalent [264.149]</p> <p>(NOTE: Required Identical Wording of Instruments, 264.151)</p>	<p>Review by Midge G</p> 		
<p><u>16. POST-CLOSURE COST ESTIMATE</u></p> <p>Applies to disposal facilities, surface impoundments, land treatment facilities [122.25(a)(16), 264.144(a)]</p>	<p>Not Applicable</p> 	<p>not applicable</p> 	
<p>A. Post-Closure - Owner/Operator of disposal facility must have written estimate of annual cost of post-closure monitoring and maintenance of the facility. [264.117 - 120]</p>			
<p>B. Facilities may choose from among the following options in establishing financial assurance:</p> <p>(i) Post-Closure Trust Fund [264.145(a)]</p> <p>(ii) Surety Bond guaranteeing payment into a post-closure trust fund. [145(b)]</p> <p>(iii) Surety Bond guaranteeing performance of post-closure care. [264.145(c)]</p>			

EPA I.D. NO.:

Lia. Ins. Req.


PERMIT	
COND.	
Ref. No.	Cond. No.

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS
iv) Post-Closure Letter of Credit (Standby Trust Fund). [264.145(d)]	Not Applicable	Not Applicable	
v) Insurance Policy for Post-Closure Care. [264.145(e)]			
vi) Financial Test/Corporate Guarantee for Post-Closure Care. [264.145(f)]			
vii) Multiple Mechanisms [264.145(g)]			
viii) State required mechanism determined equivalent. [264.149]			
NO: Required Identical Wording of Instruments [264.151]			
17. <u>LIABILITY INSURANCE POLICY</u> <u>SUDDEN & ACCIDENTAL OCCURRENCES -</u> <u>PROPERTY & BODILY INJURY -</u> <u>APPLIES TO ALL TSDs</u>	Sec I-8 Review by Midge G	Sec I-8 Reviewed by Michelle P-W	
A. Owner/Operator of TSD must demonstrate financial responsibility for claims resulting from the operation of each such facility from sudden and accidental occurrences that cause injury to persons or property. (See Attachment 2 RCRA Subpart H Liab. Ins. Checklist)			
Minimum levels of insurance:			
Sudden - \$1 million per occurrence with annual aggregate of at least \$2 million exclusive of legal defense costs.			
Facilities may choose:			
(i) RCRA Certificate of Insurance [264.147(a)(1)]			
(ii) RCRA Endorsement of Insurance [264.147(a)(2)]			
(iii) Financial Test/Corporate Guarantee for Liability Insurance [264.147(a)(3)]			
Required Identical Wording for RCRA Certificate or Endorsement of Liability Insurance. [264.151]			

GENERAL FACILITY STANDARDS

EPA I.D. NO.:





Page 27
Liab. Ins. Req.

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. Cond. No. No.
<p>B. Non-Sudden Liability Insurance - [264.147(b)]</p> <p>Applies to surface impoundments, landfills or land treatment facility. Owner or operator must have and maintain liability insurance for non-sudden occurrences at minimum levels of \$3 million per occurrence with an annual aggregate of at least \$6 million exclusive of defense costs.* (See Attachment 2 RCRA Subpart H Liab. Ins. Checklist)</p> <p>Facilities may choose:</p> <ul style="list-style-type: none"> i) RCRA Certificate of Insurance [264.147(b)(1)] ii) RCRA Endorsements of Liability Insurance [264.147(b)(2)] iii) Financial Test/Corporate Guarantee for Liability Insurance [264.147(b)(3)] <p>Required Identical Wording of RCRA Certificate or Endorsement [264.151]</p> <p>*Non-Sudden Liability Insurance [264.147(b) - Phase-in period:</p> <ul style="list-style-type: none"> i) Facilities with annual sales (>) greater than \$10 million Effective: January 1983 [264.147(b)] ii) Facilities with annual sales (>) greater than \$5 million but less than \$10 million Effective: January 1984 iii) Facilities with annual sales (<) less than \$5 million Effective: January 1985 	<p>Section I Review by Midge G.</p> 	<p>Section I Reviewed by Michelle P-W</p>		

GENERAL FACILITY STANDARDS

EPA I.D. NO.:






Page 28
Fin. Req.

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. Cond. No. No.
C. <u>Requests for Variance or Adjustment of Financial Responsibility</u> [122.25(a)(7), 264.147(d)(e)]	Not Applicable	Not Applicable		
18. <u>PROOF OF COVERAGE BY STATE FINANCIAL MECHANISM</u> [122.25(a)(18)] Use State financial requirements if determined equivalent to or greater than that provided by mechanisms of 264.143, 145, 147. Evidence of establishment of mechanism must be delivered by Certified Mail to Regional Administrator, EPA. [264.149]				
19. <u>MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING PART 264, SUBPART E</u> A. Manifests - when permittee receives hazardous waste accompanied by a manifest he must meet the requirements outlined in 264.71 and for manifest discrepancies follow 264.72. B. The permittee must keep a written operating record at the facility. The record must be kept until closure and must contain the following information: (1) Description of quantity of each waste received and method and date of its treatment, storage or disposal at facility; (Appendix I, Part 264); (11) Location of each waste within facility and quantity at each location (for wastes accompanied by manifest cross-reference to specific manifest numbers). For disposal facilities, location and quantity of waste must be recorded on diagram;	Not Addressed 	Not required in part B submission 		

GENERAL FACILITY STANDARDS

Page 29





EPA I.D. NO.:

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. Cond. No. No.
<p>(iii) Records and results of waste analyses performed in 264.13, 264.17 and 264.341;</p> <p>(iv) Summary reports and details of all incidents that require implementing contingency plan [264.56(j)];</p> <p>(v) Records and results of inspections [264.15(d)];</p> <p>(vi) Monitoring, testing or analytical data [264.347];</p> <p>(vii) For off-site facilities, notices to generators [264.12(b)];</p> <p>(viii) Closure cost estimates [264.142] and post-closure cost estimates [264.144].</p>	<p>Not Addressed</p> 			
<p><u>C. Availability, Retention and Disposition of Records [264.74]</u></p> <p>(i) All records and plans required under Part 264 must be furnished upon request and made available at all reasonable times to any representative of EPA who is duly designated by the Administrator;</p> <p>(ii) Retention period for records required under Part 264 is extended automatically during any unresolved enforcement action or as requested by the Administrator.</p> <p>(iii) Records of waste disposal locations and quantities must be submitted to Regional Administrator and local land authority upon closure (see 264.73(b)(2) for disposal fac.).</p>				
<p><u>D. Annual Report 264.75</u></p> <p>The Permittee must submit an annual report in accordance with 264.75</p>				

GENERAL FACILITY STANDARDS

Page 30

EPA I.D. NO.:

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND. Ref. Cond. No. No.
<p><u>E. Additional Reports 264.77</u> In addition to submitting annual report and unmanifested waste report the permittee must also report: (i) releases, fires and explosions [264.58(j)]; () Closure [264.115]</p> <p><u>F. Unmanifested Waste Report 264.7</u> If the permittee accepts for treatment, storage or disposal hazardous waste from an off-site source without a manifest or shipping paper [264.20 (e)(2)] and if waste is not excluded from manifest requirements, the permittee must prepare and submit one copy of a report to the Regional Regional Administrator within 15 days after receiving the waste. (See Appendix II, Part 264 for form and instructions.)</p>	<p><i>Not Addressed</i></p>  <p><i>Sec J</i></p> 	 <p><i>Section J</i> <i>ok</i></p> 		
<p><u>F. Other Federal Laws 122.25(a)(20) and 122.12</u> Permits issued shall be consistent with requirements of applicable Federal laws. These may include: (i) Wild and Scenic Rivers Act; (ii) National Historic Preservation Act of 1966; (iii) Endangered Species Act; (iv) Coastal Zone Management Act; (v) Fish and Wildlife Coordination Act.</p>				

GENERAL FACILITY STANDARDS

Page 31

EPA I.D. NO.:

ITEM	COMPLETENESS REVIEW	TECHNICAL REVIEW	COMMENTS	PERMIT COND.	
				Ref. No.	Cond. No.
<p><u>20. ENGINEER CERTIFICATION 122.25</u></p> <p>Certain technical data, such as design drawings and specifications and engineering studies shall be certified by a registered professional engineer. (NOTE: The information requiring certification may vary with the type of facility.)</p>		<p>* Certified to be compiled so as to comply with Mo Regs in Jan 17, 83 letter. Plan view drawings have P.E stamp</p>			

RCRA SUBPART H
FINANCIAL REQUIREMENTS
CHECKLIST

CLOSURE/POST CLOSURE ASSURANCE

____ Owner/Operator Name
(Legal Representative) _____

____ Facility I.D. No. _____

____ Facility Name _____

____ Facility Address _____

____ Cost Estimate Amount _____

____ Financial Instrument _____

____ Financial Party _____

____ Signatures _____

____ Effective Date _____

____ Expiration Date _____

____ Notary/Seals _____

SPECIFIC AREAS

Trust Fund

____ Schedule A _____

____ Deposit Certification _____

____ Anniversary Date _____

____ Acknowledgement _____

Surety Bonds

____ Verification of Surety Company _____

____ Guarantee Bond _____

____ Performance Bond _____

____ Standby Trust Fund _____

Letters of Credit

____ Standby Trust Fund _____

Insurance Certificate SubmittedFinancial Test - Required Items Letter from Chief Financial Officer Independent CPA's Report on Examination Independent CPA's Special Report Satisfied Financial Test CriteriaCorporate Guarantee Financial Test Submissions Guarantee FormReview Comments Instruments have identical wording to regulations Submission adequate per regulationsLetter to Facility Adequate Submission Deficiency/Request Additional Submission CommentsSupplemental/Revised Submission Received Adequate Per Regulations

File referred to AWCM for action:

PMTS Review Complete: _____

Date: _____

RCRA SUBPART H
LIABILITY INSURANCE
CHECKLIST

____ Owner/Operator Name _____
(Legal Representative) _____

____ Facility I.D. No. _____
Name _____
Address _____

____ Insurance Agency/Broker _____
Address _____

____ Amount and Type of Coverage _____

____ Sudden (Required for all TSDs - \$1 mil occur/\$2 mil annual)
Effective Date: _____
Expiration Date: _____

____ Non-Sudden (Required for Land Treatment, Surface Impoundment -
\$3 mil occur/\$6 mil annual)
Effective Date:
Jan. 1983
Jan. 1984
Jan. 1985
Expiration Date: _____

____ RCRA Endorsement

____ RCRA Certificate

____ Licensed as Excess or Surplus Lines Carrier
State _____

____ Financial Test
____ Letter from Chief Financial Officer
____ Independent CPA's Report on Examination
____ Independent CPA's Special Report
____ Satisfied Financial Test Criteria

Review Comments

____ Instruments have identical wording to regulations

____ Submission adequate per regulations

____ Letter to Facility to be incorporated with
Closure Assurance Financial Documents

PMTS Review Complete: _____
DATE: _____